

EXHIBIT F

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF NEW YORK
3 CIVIL ACTION NO.: 20-CV-01413

4 The Estate of Joseph P. King,
5 by and through its Administrator
6 ad Prosequendum Amy King,
7 and in her own right,

8 Plaintiff,

9 v.

10 WARD, et al.,

11 Defendant.

12 *****

13 REMOTE VIDEO DEPOSITION OF JAMI PALLADINO

14 MAY 23, 2022

15 *****

16
17 REMOTE VIDEO DEPOSITION OF JAMI PALLADINO taken
18 in the above-styled and numbered cause on May 23, 2022,
19 commencing at 1:00 p.m. Eastern Standard Time, before Gina
20 Williams, Registered Professional Reporter, Certified
21 Realtime Reporter, and Certified Realtime Captioner.
22
23
24
25

A P P E A R A N C E S

(All attorneys appearing remotely)

On behalf of Plaintiff:

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New York, New York 10016

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On behalf of Defendants:

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By: AIMEE COWAN, ESQUIRE

QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT
NECESSARILY REFLECT A DIRECT QUOTE

I N D E X

WITNESS	PAGE
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JAMI PALLADINO	
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Examination by Ms. Kalkach	4
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E X H I B I T S

Number	
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Exhibit A	Amended Complaint	12
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Exhibit B	Answer to Amended Complaint	13
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<p>Page 4</p> <p>1 WHEREUPON,</p> <p>2 JAMI PALLADINO</p> <p>3 was called as a witness and, after having been first duly</p> <p>4 sworn, was deposed and testified as follows:</p> <p>5 EXAMINATION</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Good morning, Ms. Palladino. My name is Yamile</p> <p>8 Kalkach. I'm an associate at the law firm that represents</p> <p>9 Plaintiff, the Estate of Joseph King.</p> <p>10 Could you please state your full name and current</p> <p>11 address for the record?</p> <p>12 A Jami Ann Palladino.</p> <p>13 My work address or my home address?</p> <p>14 Q Your home address.</p> <p>15 A 911 Culverton Road, Rome, New York 13440.</p> <p>16 Q Thank you. Ms. Palladino, I'm going to go over a</p> <p>17 few ground rules to help today to run as quickly and</p> <p>18 smoothly as possible.</p> <p>19 Have you ever been deposed before?</p> <p>20 A No.</p> <p>21 Q Have you ever testified at trial?</p> <p>22 A No.</p> <p>23 Q So you may not be familiar with how this works;</p> <p>24 correct?</p> <p>25 A Yes.</p>	<p>Page 6</p> <p>1 what we're both saying and write it down.</p> <p>2 Do you understand?</p> <p>3 A Yes.</p> <p>4 Q If at any time today you need a break, please</p> <p>5 simply just say so, and I will accommodate. The only thing</p> <p>6 that I ask from you is that if I asked a question, you</p> <p>7 answer it before asking for the break, okay?</p> <p>8 A Yes.</p> <p>9 Q Perfect.</p> <p>10 There may be many times today that your attorney</p> <p>11 may object to a question that I ask you. Unless your</p> <p>12 attorney directs you not to answer the question, you still</p> <p>13 must answer.</p> <p>14 Understood?</p> <p>15 A Yes.</p> <p>16 Q Okay. Now, please shut off or put on vibrate any</p> <p>17 other device that you have around you. It could be a cell</p> <p>18 phone, Apple watch, iPad, or any other computer.</p> <p>19 Also, please close any other document or program</p> <p>20 on your screen other than Zoom and the ones that I will --</p> <p>21 other than Zoom or the programs -- the documents that I will</p> <p>22 be showing you today.</p> <p>23 Are there any paper documents in front of you?</p> <p>24 A No.</p> <p>25 Q Is there anybody in the room with you?</p>
<p>Page 5</p> <p>1 Q So do you understand that you are under oath</p> <p>2 today?</p> <p>3 A Yes.</p> <p>4 Q And that this is the same oath that you would</p> <p>5 take in a courtroom?</p> <p>6 A Yes.</p> <p>7 Q Are you on any medications which may affect your</p> <p>8 ability to testify truthfully today?</p> <p>9 A No.</p> <p>10 Q So if you don't hear or understand a question</p> <p>11 that I ask you, please feel free to ask me to repeat or</p> <p>12 rephrase the question, and I will.</p> <p>13 That means that if you answer a question that I</p> <p>14 ask, I will assume that you understood the question and your</p> <p>15 answer was based on that understanding, okay?</p> <p>16 A Yes.</p> <p>17 Q It's also important that you give me verbal</p> <p>18 answers as opposed to a head nod or showing me things with</p> <p>19 your hands, et cetera, so the court reporter may take down</p> <p>20 your words.</p> <p>21 Understood?</p> <p>22 A Yes.</p> <p>23 Q Let's try our best not to talk over one another.</p> <p>24 Again, the court reporter is writing everything down, so if</p> <p>25 we talk over one another, she may not be able to understand</p>	<p>Page 7</p> <p>1 A No.</p> <p>2 Q Are you currently under the influence of any</p> <p>3 drugs or alcohol that in any way may affect your testimony?</p> <p>4 A No.</p> <p>5 Q What did you do, if anything, to prepare for</p> <p>6 today's deposition?</p> <p>7 A I conferred with my legal representation.</p> <p>8 Q When?</p> <p>9 A On May 10.</p> <p>10 Q For how long?</p> <p>11 A For about an hour.</p> <p>12 Q Other than your counsel, was anybody else</p> <p>13 present?</p> <p>14 A No.</p> <p>15 Q Did you review any documents when you met with</p> <p>16 your counsel?</p> <p>17 A No.</p> <p>18 Q Did you discuss today's deposition with anyone</p> <p>19 else other than your counsel?</p> <p>20 A No.</p> <p>21 Q Do you keep notes about your workday?</p> <p>22 A Can you repeat the question? I'm sorry.</p> <p>23 Q Yes.</p> <p>24 Do you keep notes about your workday?</p> <p>25 A No.</p>

<p>Page 8</p> <p>1 Q Do you keep a diary about your workday?</p> <p>2 A No.</p> <p>3 Q Have you ever used any other names?</p> <p>4 A No.</p> <p>5 Q Have you ever been convicted of a crime?</p> <p>6 A No.</p> <p>7 Q When were you born?</p> <p>8 A July 21, 1979.</p> <p>9 Q Where were you born?</p> <p>10 A Minneola, New York.</p> <p>11 Q Are you married?</p> <p>12 A No.</p> <p>13 Q Do you have kids?</p> <p>14 A Yes.</p> <p>15 Q How many?</p> <p>16 A Three.</p> <p>17 Q Aside from the instant action, to your knowledge</p> <p>18 have any complaints and/or grievances been filed against</p> <p>19 you?</p> <p>20 A No.</p> <p>21 Q Have you ever been subject of a disciplinary</p> <p>22 complaint?</p> <p>23 A No.</p> <p>24 Q Have you ever been a party in a lawsuit before?</p> <p>25 A No.</p>	<p>Page 10</p> <p>1 A I took a test.</p> <p>2 Q Okay. Could you briefly walk me through your</p> <p>3 employment history leading up to your current position?</p> <p>4 A I started working with NTA Connections BRC in</p> <p>5 2006 to 2008. I worked in case management from 2009 until</p> <p>6 2012 for Mental Health Association of Nassau County. I</p> <p>7 worked in a PROs program from 2012 to 2013, and I've been at</p> <p>8 this position since 2013.</p> <p>9 Q Which position are you currently in?</p> <p>10 A Currently I'm a discharge planner, prerelease</p> <p>11 coordinator.</p> <p>12 Q When did you start working there?</p> <p>13 A I switched from general population therapist to</p> <p>14 prerelease coordinator in December of 2018.</p> <p>15 Q Before that what were you doing?</p> <p>16 A I was a general population therapist from 2013 to</p> <p>17 2018, same facility, different position.</p> <p>18 Q I understand.</p> <p>19 What were your duties and responsibilities when</p> <p>20 you were working as the general population therapist?</p> <p>21 A I managed a caseload of people that are open to</p> <p>22 mental health services, provided monthly therapy.</p> <p>23 Q Who did you report to?</p> <p>24 A I reported to Hal Meyers, unit chief.</p> <p>25 Q And who reported to you?</p>
<p>Page 9</p> <p>1 Q Have you ever testified in court?</p> <p>2 A No.</p> <p>3 Q Have you ever testified in a deposition?</p> <p>4 A No.</p> <p>5 Q Okay. Where did you --</p> <p>6 Please erase that.</p> <p>7 Did you attend college?</p> <p>8 A Yes.</p> <p>9 Q Where did you go?</p> <p>10 A I went to Stonybrook University.</p> <p>11 Q When did you go there?</p> <p>12 A 2007 until 2010.</p> <p>13 Q What did you study?</p> <p>14 A Social work.</p> <p>15 Q Besides college, do you have any other --</p> <p>16 Did you ever take any other certification program</p> <p>17 or licensing program?</p> <p>18 A No.</p> <p>19 Q Do you have any licenses?</p> <p>20 A Yes.</p> <p>21 Q What are these licenses?</p> <p>22 A Licensed clinical social worker.</p> <p>23 Q When did you obtain it?</p> <p>24 A 2017.</p> <p>25 Q How did you obtain it?</p>	<p>Page 11</p> <p>1 A I'm sorry?</p> <p>2 Q Who reported to you?</p> <p>3 A Nobody.</p> <p>4 Q Did you get training in this job?</p> <p>5 A Yes.</p> <p>6 Q Describe the training that you received.</p> <p>7 A I would --</p> <p>8 One second. I'm sorry.</p> <p>9 My training was, I shadowed another employee</p> <p>10 where they taught me how to complete the documentation, how</p> <p>11 to run a session with a patient.</p> <p>12 Q Besides this training, did you ever get any other</p> <p>13 kind of training from the facility?</p> <p>14 A I've gotten many different trainings like in</p> <p>15 different topics.</p> <p>16 Q Were those mandatory?</p> <p>17 A Yes.</p> <p>18 Q What were they?</p> <p>19 A I'm just thinking. There's been quite a few.</p> <p>20 Q That's okay.</p> <p>21 A Workplace violence. They have their mandatory</p> <p>22 training of workplace violence, sexual harassment, of HIPAA,</p> <p>23 of --</p> <p>24 Those are the yearly trainings that we get every</p> <p>25 year.</p>

<p>1 Q Okay. Only these three or just the ones you're</p> <p>2 remembering right now?</p> <p>3 A Those are just the ones that I can remember right</p> <p>4 now.</p> <p>5 Q Okay. Did you talk about this lawsuit with</p> <p>6 anyone you work with?</p> <p>7 A No.</p> <p>8 Q Do you remember when the lawsuit was filed?</p> <p>9 A I don't remember.</p> <p>10 MS. KALKACH: I offer Ms. Palladino Exhibit A</p> <p>11 into evidence.</p> <p>12 David, could you please show her Exhibit A?</p> <p>13 (Exhibit A was marked for identification.)</p> <p>14 BY MS. KALKACH:</p> <p>15 Q So just take a minute to read the document.</p> <p>16 You don't have to read it line by line. I just</p> <p>17 want to know if you recognize it.</p> <p>18 A Yes.</p> <p>19 Q You do?</p> <p>20 A Yes.</p> <p>21 Q Okay. What do you recognize this document to be?</p> <p>22 A This is the --</p> <p>23 This is the civil action from the Estate of</p> <p>24 Mr. King.</p> <p>25 Q How are you familiar with this document?</p>	<p>Page 12</p> <p>1 is?</p> <p>2 What does it --</p> <p>3 A It's requesting a jury trial.</p> <p>4 Q So this is the Answer to the Complaint.</p> <p>5 Did you ever participate at any time in the</p> <p>6 drafting of this document?</p> <p>7 A No.</p> <p>8 Q Have you signed any written statements or made</p> <p>9 any recorded statements or spoken to attorneys or</p> <p>10 investigators or reporters about the events related to this</p> <p>11 lawsuit?</p> <p>12 A Just my counsel.</p> <p>13 Q Okay. Did you know Mr. Joseph King?</p> <p>14 A Yes.</p> <p>15 Q Why did you know him?</p> <p>16 A He was my patient.</p> <p>17 Q When did you meet him?</p> <p>18 A 2013.</p> <p>19 Q What was the nature of your relationship?</p> <p>20 A He was my patient.</p> <p>21 Q Do you know when he was incarcerated?</p> <p>22 A I don't remember.</p> <p>23 Q Do you know why he was incarcerated?</p> <p>24 A I don't remember.</p> <p>25 Q How often would you converse with Mr. King?</p>
<p>Page 13</p> <p>1 A I obtained a copy of this via e-mail.</p> <p>2 Q When?</p> <p>3 A I don't remember.</p> <p>4 Q An approximate date, month and year?</p> <p>5 A I don't remember.</p> <p>6 Q Do you remember the year?</p> <p>7 A The year that it was sent out.</p> <p>8 No, I don't.</p> <p>9 Q Did you review this document prior to today?</p> <p>10 A Not since I've received them, no.</p> <p>11 MS. KALKACH: Okay. Now, I offer Ms. Palladino</p> <p>12 Exhibit B into evidence.</p> <p>13 David, could you please show Ms. Palladino</p> <p>14 Exhibit B?</p> <p>15 (Exhibit B was marked for identification.)</p> <p>16 BY MS. KALKACH:</p> <p>17 Q Ms. Palladino, please take a minute to review</p> <p>18 this exhibit. I just want to know if you recognize the</p> <p>19 document or not.</p> <p>20 A Yes.</p> <p>21 MS. KALKACH: Okay. Thank you, David.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q What do you recognize this document to be?</p> <p>24 A This is what's been from the Estate of Mr. King.</p> <p>25 Q Do you recognize specifically what this document</p>	<p>Page 14</p> <p>1 A Once a month.</p> <p>2 Q What was your role in Mr. King's life while he</p> <p>3 was incarcerated?</p> <p>4 A I was his therapist.</p> <p>5 Q And what were your job duties as a therapist with</p> <p>6 respect to Mr. King?</p> <p>7 A To provide supportive counseling, to provide</p> <p>8 verbal therapy.</p> <p>9 Q Were you aware of any specific problems Mr. King</p> <p>10 dealt while he was incarcerated?</p> <p>11 MS. COWAN: Objection. You can answer.</p> <p>12 THE WITNESS: Answer?</p> <p>13 MS. COWAN: Yeah, you can answer.</p> <p>14 A Can you repeat the question? I'm sorry.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q Yes.</p> <p>17 Were you aware of any specific problems Mr. King</p> <p>18 dealt with while he was incarcerated?</p> <p>19 A Yes.</p> <p>20 Q Which problems?</p> <p>21 A Difficulty in coping with the environment.</p> <p>22 Q Were you aware he thought his wife was sleeping</p> <p>23 with another person?</p> <p>24 A No.</p> <p>25 Q Were you aware about his thought about his</p>

<p>Page 16</p> <p>1 marriage suffering?</p> <p>2 A No.</p> <p>3 Q Were you aware that he had been fighting with his</p> <p>4 wife the week leading up to his suicide?</p> <p>5 A No.</p> <p>6 Q Do you know when was the last conversation he had</p> <p>7 with his wife?</p> <p>8 A No.</p> <p>9 Q Do you know when was the last conversation he had</p> <p>10 with his children?</p> <p>11 A No.</p> <p>12 Q Were you aware he spoke to other inmates about</p> <p>13 his mental state?</p> <p>14 A No.</p> <p>15 Q What was the sum and substance of the</p> <p>16 conversations you had with Mr. King?</p> <p>17 MS. COWAN: Objection, but go ahead.</p> <p>18 A About his daily --</p> <p>19 About how he was functioning in general</p> <p>20 population.</p> <p>21 BY MS. KALKACH:</p> <p>22 Q Did you speak about his behaviors towards other</p> <p>23 inmates?</p> <p>24 A Not that I recall.</p> <p>25 Q Were you aware that Mr. King used Suboxone?</p>	<p>Page 18</p> <p>1 Q What kind of prescription medication was he</p> <p>2 taking?</p> <p>3 A I don't recall.</p> <p>4 Q Do you know what they were used for?</p> <p>5 A For antianxiety and antidepressants.</p> <p>6 Q When was he taking them, which period of time?</p> <p>7 A He was taking medication for most of his</p> <p>8 incarceration.</p> <p>9 Q Who prescribed them?</p> <p>10 A The prescriber.</p> <p>11 Q Do you know his name?</p> <p>12 A Dr. Thomas, Dr. Hernandez, Ms. Citrin.</p> <p>13 There was three of them.</p> <p>14 Q There were three of them?</p> <p>15 Can you please repeat the names?</p> <p>16 A Dr. Thomas.</p> <p>17 Q Do you know his last name?</p> <p>18 A That's her --</p> <p>19 It's Karen Thomas.</p> <p>20 Dr. Hernandez. I don't remember his first name.</p> <p>21 Kari Citrin.</p> <p>22 Q Can you spell that last name for me, please?</p> <p>23 A C-i-t-r-i-n.</p> <p>24 Q Was he still taking these medications at the time</p> <p>25 of the suicide?</p>
<p>Page 17</p> <p>1 A Yes.</p> <p>2 Q Did you speak to him about his use?</p> <p>3 A Yes.</p> <p>4 Q What did he tell you about his drug use?</p> <p>5 A He stated that he was not using.</p> <p>6 Q He stated he was not using, yet you were aware</p> <p>7 that he was using?</p> <p>8 A I'm sorry?</p> <p>9 Q So he stated that he was using?</p> <p>10 A No. He stated that he was not using.</p> <p>11 Q How did you become aware that he was using</p> <p>12 Suboxone?</p> <p>13 A He had shared it with me.</p> <p>14 Q When did he share this with you?</p> <p>15 A During session. I don't remember which one</p> <p>16 though.</p> <p>17 Q Were you aware of any other drugs that he was</p> <p>18 taking within the time of his incarceration?</p> <p>19 A No.</p> <p>20 Q Were you aware of any prescription drugs that he</p> <p>21 was taking during the time of his incarceration?</p> <p>22 A Will you repeat that, please?</p> <p>23 Q Were you aware of any prescription medication</p> <p>24 that he was taking during the time of his incarceration?</p> <p>25 A Yes.</p>	<p>Page 19</p> <p>1 A I think they were discontinued.</p> <p>2 Q Do you know when he stopped taking them?</p> <p>3 A I don't recall.</p> <p>4 Q Do you know why they were discontinued?</p> <p>5 A He was --</p> <p>6 He expressed complaints about his symptoms. The</p> <p>7 doctor discontinued the medication and was scheduled to meet</p> <p>8 with him in two weeks in order to restart medication.</p> <p>9 Q When was this?</p> <p>10 A That was my last visit with him, November -- the</p> <p>11 end of November, 2018.</p> <p>12 Q Do you know if the medication was cut off at</p> <p>13 once?</p> <p>14 A I don't recall.</p> <p>15 Q Who was aware of the decision of taking him off</p> <p>16 his medication?</p> <p>17 MS. COWAN: Objection. Go ahead.</p> <p>18 A The --</p> <p>19 I guess the nurses.</p> <p>20 BY MS. KALKACH:</p> <p>21 Q Only the nurses and yourself?</p> <p>22 A And the prescriber.</p> <p>23 Q The three of them?</p> <p>24 A There was only one doctor, the last doctor --</p> <p>25 It was three different doctors at three different</p>

Page 20	Page 22
<p>1 periods.</p> <p>2 Q Okay.</p> <p>3 A Dr. Thomas was the last one.</p> <p>4 Q What was the period that Dr. Thomas was his</p> <p>5 prescriber?</p> <p>6 A I don't know.</p> <p>7 Q Which one was the first one?</p> <p>8 A I don't know. I can't remember.</p> <p>9 Q Was Mr. King worried about his medication being</p> <p>10 cut off?</p> <p>11 A Not at the time.</p> <p>12 Q At which time?</p> <p>13 A Not at the time of when it was discontinued.</p> <p>14 It was an agreement between the doctor and</p> <p>15 patient.</p> <p>16 Q When did he become concerned or worried about</p> <p>17 discontinuance of his medication?</p> <p>18 A Not to my --</p> <p>19 Not to my knowledge.</p> <p>20 Q I said when.</p> <p>21 Because you said that at the beginning he wasn't.</p> <p>22 Was he ever worried that it could affect him not</p> <p>23 having his medication?</p> <p>24 A Not that I'm aware of.</p> <p>25 Q Okay. What if any were Mr. King's feelings about</p>	<p>1 What if anything you did in response of the</p> <p>2 letters that you received?</p> <p>3 A Follow protocol.</p> <p>4 Our policy is to see the patient within two weeks</p> <p>5 of receiving a letter, discuss what the concerns are, and</p> <p>6 bring it to the prescriber's attention.</p> <p>7 Q So did you set up sessions to address the</p> <p>8 letters?</p> <p>9 A Yes.</p> <p>10 Q And did you report his concerns to the</p> <p>11 prescriber?</p> <p>12 A Yes.</p> <p>13 Q Were you aware of Mr. King sending letters to any</p> <p>14 other of your co-workers?</p> <p>15 A Could have been to the prescribers.</p> <p>16 Q How did you become aware?</p> <p>17 A They were in the chart.</p> <p>18 Q Did you ever read those letters?</p> <p>19 A Sorry. I'm in my office. I'm sorry.</p> <p>20 Can you repeat that again?</p> <p>21 Q Did you ever read those letters?</p> <p>22 A Yes.</p> <p>23 Q What were the sum and substance of those letters?</p> <p>24 A Expressing his concerns about the symptoms he's</p> <p>25 experiencing and requesting to be seen by the doctor earlier</p>
Page 21	Page 23
<p>1 his medication not being given to him anymore?</p> <p>2 A I did not receive anything indicating that he had</p> <p>3 any issues about it not being given.</p> <p>4 Q Did he ever send you letters?</p> <p>5 A Yes.</p> <p>6 Q How many letters did you receive?</p> <p>7 A A few.</p> <p>8 Q When you say "a few," you mean from 1 to 5, 5 to</p> <p>9 10, 10 to 20, or something else?</p> <p>10 A No, probably between 5 to 10, but that's over the</p> <p>11 duration of the time that we worked together from 2013 to</p> <p>12 2018.</p> <p>13 Q And what was the content of the letters, the sum</p> <p>14 and substance of what they said?</p> <p>15 A Concerns about --</p> <p>16 They were concerns about his medication being</p> <p>17 discontinued earlier on before that.</p> <p>18 Q Before --</p> <p>19 Before what?</p> <p>20 A Before his final --</p> <p>21 Before the last one.</p> <p>22 Before the last time when he met with the doctor.</p> <p>23 There have been other periods that he discontinued</p> <p>24 medication.</p> <p>25 Q I understand.</p>	<p>1 or in response to his concerns.</p> <p>2 Q And what if anything did you do with this</p> <p>3 information?</p> <p>4 A Conferred with the doctor to make sure to see if</p> <p>5 the doctor had addressed it.</p> <p>6 Q And what did the doctor say to you?</p> <p>7 A That his appointment would be scheduled, and he</p> <p>8 would be seen accordingly.</p> <p>9 Q Did you follow up on his appointments being</p> <p>10 scheduled?</p> <p>11 A No.</p> <p>12 Q Was Mr. King suffering from withdrawal?</p> <p>13 MS. COWAN: Objection. Go ahead.</p> <p>14 A I don't know.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q Did you ever speak to his wife about the way his</p> <p>17 drugs were administered?</p> <p>18 A No.</p> <p>19 Q Did you speak with his wife at all about his care</p> <p>20 while he was incarcerated?</p> <p>21 A One time. I spoke to Mrs. King once.</p> <p>22 Q What was the sum and substance of that</p> <p>23 conversation?</p> <p>24 A Mrs. King --</p> <p>25 You know, Mrs. King expressed concern about</p>

<p>Page 24</p> <p>1 because Mr. King was writing -- wrote quite a few letters</p> <p>2 consecutively, and she wanted to make me aware that he was</p> <p>3 having some anxiety.</p> <p>4 And I had an appointment scheduled with him, and</p> <p>5 I explained to her that I've been trying to work on him --</p> <p>6 work on with him to use alternative coping skills in</p> <p>7 addition to medication to help him cope, which he was not</p> <p>8 receptive to.</p> <p>9 Q What was the alternative coping?</p> <p>10 A I'm sorry?</p> <p>11 Q What were those alternative coping mechanisms?</p> <p>12 A Deep breathing, distress intolerance, grounding</p> <p>13 techniques, and there were worksheets. I had a bunch of</p> <p>14 different worksheets that I'd try to give him to use to</p> <p>15 complete and bring them back to me so he can get a</p> <p>16 completion certificate for it, but he was not receptive.</p> <p>17 Q Why was he not receptive?</p> <p>18 A He always wanted to talk about medication, which</p> <p>19 I had no control over.</p> <p>20 Q How close in time to his suicide did you receive</p> <p>21 a letter from Mr. King?</p> <p>22 A I don't recall. I don't remember.</p> <p>23 Q Do you know how close in time to his suicide that</p> <p>24 Mrs. King received a letter from Mrs. King -- from Mr. King?</p> <p>25 A No.</p>	<p>Page 26</p> <p>1 A I don't remember.</p> <p>2 Q Do you know if there were any misbehavior</p> <p>3 reports?</p> <p>4 MS. COWAN: Against Mr. King?</p> <p>5 MS. KALKACH: Yes, against Mr. King.</p> <p>6 A Yes.</p> <p>7 BY MS. KALKACH:</p> <p>8 Q Who made the reports?</p> <p>9 A Corrections. It was corrections officers,</p> <p>10 DOCCS-related.</p> <p>11 Q For what were the misbehavior reports?</p> <p>12 A I'm pretty sure it was drug use.</p> <p>13 Q Did you speak to Mr. King about parole?</p> <p>14 A Yes.</p> <p>15 Q Did you speak to him about his upcoming parole</p> <p>16 hearing?</p> <p>17 A I don't remember.</p> <p>18 Q When did you speak to him about parole?</p> <p>19 A Usually we would talk about it before the parole</p> <p>20 board would come up because we would discuss discharge</p> <p>21 planning, so whatever the previous board to that was two</p> <p>22 years prior to that.</p> <p>23 Q And what were his feelings about parole hearing?</p> <p>24 A He was hoping to make the board so he could leave</p> <p>25 so he could go home to his family.</p>
<p>Page 25</p> <p>1 Q How close in time to his suicide did you speak to</p> <p>2 Mrs. King?</p> <p>3 A Years. A couple years before.</p> <p>4 Q How close in time to his suicide did you try to</p> <p>5 do this alternative coping therapy?</p> <p>6 A Every time I met with him.</p> <p>7 Q So up to the session in November, you were still</p> <p>8 trying to?</p> <p>9 A Yes.</p> <p>10 Q Besides Suboxone and the prescription drugs, were</p> <p>11 you aware of any other drugs that he was taking?</p> <p>12 A No.</p> <p>13 Q Was Mr. King ever disciplined while he was</p> <p>14 incarcerated?</p> <p>15 A I don't know.</p> <p>16 Q Was he ever in isolation?</p> <p>17 A Can you repeat that?</p> <p>18 Q Was he ever in isolation?</p> <p>19 MS. COWAN: Objection. Go ahead.</p> <p>20 A He was in the crisis unit. Whether he was in the</p> <p>21 special housing unit, I don't recall.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q In which unit did you say he was?</p> <p>24 A I know he went to the crisis unit in 2016.</p> <p>25 Q Did he ever get sanctioned?</p>	<p>Page 27</p> <p>1 Q Was he worried?</p> <p>2 A Yes.</p> <p>3 Q Did he express any concern about getting more</p> <p>4 years?</p> <p>5 A No.</p> <p>6 Q Why was he worried?</p> <p>7 A Because he didn't know if he was going to --</p> <p>8 If he didn't make the board, then it would take</p> <p>9 longer for him until his conditional release date to go</p> <p>10 home.</p> <p>11 Q Did he think it would lead to his wife leaving</p> <p>12 him for someone else?</p> <p>13 A I don't know.</p> <p>14 Q Did you know about Mr. King's mental health</p> <p>15 diagnosis?</p> <p>16 A Yes.</p> <p>17 Q What was his diagnosis?</p> <p>18 A I don't remember.</p> <p>19 Q Were you aware that he tried to commit suicide?</p> <p>20 A Yes.</p> <p>21 Q Do you know when he tried to commit suicide?</p> <p>22 A 2016.</p> <p>23 Q Do you know the month?</p> <p>24 A No.</p> <p>25 Q Did he tell you what led him to his suicide</p>

<p>1 attempt?</p> <p>2 A No.</p> <p>3 Q Let me clarify this one.</p> <p>4 Did he tell you what led him to the suicide</p> <p>5 attempt of 2016?</p> <p>6 A No.</p> <p>7 Q Are you aware of how he tried to do it?</p> <p>8 A Yes.</p> <p>9 Q How?</p> <p>10 A With shoelaces he tried to hang up.</p> <p>11 Q Did you ever speak to him about how he was</p> <p>12 feeling while in prison regarding suicide?</p> <p>13 A Yes.</p> <p>14 Q And what was the sum and substance of his</p> <p>15 conversation with you about it?</p> <p>16 A That he would never try that again.</p> <p>17 Q How often did you see Mr. King?</p> <p>18 A I saw him once a month.</p> <p>19 Q Where would you meet?</p> <p>20 A In a private room down in the mental health</p> <p>21 building.</p> <p>22 Q Were the meetings established or done by request</p> <p>23 or something else?</p> <p>24 A Policy is for the patient to be seen once every</p> <p>25 30 days. And if they wrote a letter, it was within two</p>	Page 28	<p>1 A Can you clarify that?</p> <p>2 Q Yes.</p> <p>3 So after you met with an inmate, you would make</p> <p>4 the notes, and then did you have to make a report?</p> <p>5 A No.</p> <p>6 I would write my progress note, file it in the</p> <p>7 chart, unless I had a concern.</p> <p>8 Q What would make you concerned about an inmate?</p> <p>9 A If somebody is reporting psychotic symptoms or if</p> <p>10 somebody is having suicidal ideation or if somebody is</p> <p>11 having thoughts of self-harm.</p> <p>12 Q And who do you report this to?</p> <p>13 A To my unit chief and to the crisis coordinator if</p> <p>14 the person requires a high level of care.</p> <p>15 Q Did you ever report to your unit chief at any</p> <p>16 point?</p> <p>17 MS. COWAN: Objection. With respect to Mr. King</p> <p>18 or anybody?</p> <p>19 MS. KALKACH: With respect to Mr. King, yes.</p> <p>20 Yes, with respect to Mr. King.</p> <p>21 A No.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q Did you ever have a meeting with Hal Meyers,</p> <p>24 Mr. King and yourself?</p> <p>25 A I don't think so, no.</p>
<p>1 weeks of the letter.</p> <p>2 So I would see him once a month. I don't</p> <p>3 remember how often or not, but if he wrote a letter, I would</p> <p>4 see him within two weeks of the letter.</p> <p>5 Q Are you allowed to take notes when you see</p> <p>6 inmates?</p> <p>7 A Yes.</p> <p>8 Q Does anyone else have access to these notes?</p> <p>9 A No.</p> <p>10 Q Did you take any notes about what you spoke with</p> <p>11 Mr. King?</p> <p>12 A Yes.</p> <p>13 Q Where do you keep the notes that you take during</p> <p>14 a meeting?</p> <p>15 A I write my progress notes using those notes that</p> <p>16 I keep, and then I shred them.</p> <p>17 Q Before you shred them, did anybody else review</p> <p>18 them?</p> <p>19 A No.</p> <p>20 Q So do you still have the notes that you took</p> <p>21 during Mr. King's meeting?</p> <p>22 A No, not the shredded notes, not my own personal</p> <p>23 notes.</p> <p>24 Q Did you make reports of your meeting with</p> <p>25 inmates?</p>	Page 29	<p>1 Q Did you have concerns about Mr. King in the weeks</p> <p>2 leading up to the suicide?</p> <p>3 A No.</p> <p>4 Q Okay. In general, do you speak to other inmates?</p> <p>5 A Yes.</p> <p>6 Q To whom do you speak?</p> <p>7 A I speak to my caseload, the people that are on my</p> <p>8 caseload.</p> <p>9 Q How many people do you have on your caseload?</p> <p>10 A Right now I only have seven. I do discharge</p> <p>11 planning.</p> <p>12 Q And back in 2018, how many people did you have in</p> <p>13 your caseload?</p> <p>14 A Anywhere between 150 and 180.</p> <p>15 Q Why do you have way less inmates in your caseload</p> <p>16 now?</p> <p>17 A Because I do discharge planning. I no longer do</p> <p>18 therapy.</p> <p>19 Q I see.</p> <p>20 Did any of the inmates that you spoke to back in</p> <p>21 2018 know Mr. King?</p> <p>22 A I don't know.</p> <p>23 Q How is the correctional facility arranged?</p> <p>24 A I don't understand what you're asking.</p> <p>25 Q So are there cells, dorms, cubes?</p>

<p>Page 32</p> <p>1 How are the inmates organized?</p> <p>2 How is the whole facility organized?</p> <p>3 A Honestly, I'm not sure. I don't really venture</p> <p>4 out of the mental health building.</p> <p>5 Q Were you aware if Mr. King had inmates that he</p> <p>6 shared his cube with, or dorm?</p> <p>7 A No, I wasn't sure.</p> <p>8 Q So did you speak with any other inmate after</p> <p>9 Mr. King's suicide?</p> <p>10 A Yes.</p> <p>11 Q Who did you speak with?</p> <p>12 A His name was Thomas Aikens, and my understanding</p> <p>13 is that he was in the same dorm, but I couldn't tell you how</p> <p>14 it was arranged.</p> <p>15 Q I understand.</p> <p>16 What was the sum and substance of the</p> <p>17 communication?</p> <p>18 A That he was -- he reported that he was</p> <p>19 traumatized by the suicide of Mr. King.</p> <p>20 Q Did he tell you anything about Mr. King's</p> <p>21 behavior leading up to the suicide?</p> <p>22 A That he was --</p> <p>23 That --</p> <p>24 What Mr. Aikens had talked about was that he just</p> <p>25 couldn't believe that somebody that he lived with did</p>	<p>Page 34</p> <p>1 A No.</p> <p>2 Q Did any of your co-workers speak to you about</p> <p>3 anything related to Mr. King?</p> <p>4 A No.</p> <p>5 Q Were you aware of any written or spoken</p> <p>6 statements made to his family about Mr. King's feelings</p> <p>7 within the month leading up to his suicide?</p> <p>8 A No.</p> <p>9 Q Were you aware of any written or spoken</p> <p>10 statements made by Mr. King to his friends about his</p> <p>11 feelings within the month leading up to his suicide?</p> <p>12 A No.</p> <p>13 Q Did you ever see the suicide note Mr. King wrote</p> <p>14 on November 15, 2018?</p> <p>15 A No.</p> <p>16 Q In general, does anybody read notes before they</p> <p>17 are delivered to inmates' family and friends?</p> <p>18 MS. COWAN: Objection. Go ahead.</p> <p>19 A I don't know. They might be.</p> <p>20 BY MS. KALKACH:</p> <p>21 Q Have you ever spoken to your family about</p> <p>22 Mr. King?</p> <p>23 A No.</p> <p>24 Q Are you aware of any policy regarding shoelaces</p> <p>25 and inmates?</p>
<p>Page 33</p> <p>1 something like that.</p> <p>2 Q Did he say anything about Mr. King's behavior or</p> <p>3 just his perception?</p> <p>4 A His perception.</p> <p>5 Just his perception of the event.</p> <p>6 Q Have you ever spoken to this inmate before the</p> <p>7 suicide?</p> <p>8 A In regards to --</p> <p>9 Can you reframe that, please?</p> <p>10 Q Have you ever spoke to this inmate before --</p> <p>11 before the suicide about anything?</p> <p>12 A Yes. He was on my caseload.</p> <p>13 Q Okay. Did he ever tell you anything about</p> <p>14 Mr. King's behavior?</p> <p>15 A No.</p> <p>16 Q Did you speak to anybody else besides Thomas</p> <p>17 Aikens after the suicide?</p> <p>18 A No.</p> <p>19 Not about Mr. King, no.</p> <p>20 Q Were you aware of statements made to any of your</p> <p>21 co-workers about Mr. King's state of mind within the week</p> <p>22 leading up to the suicide?</p> <p>23 A No.</p> <p>24 Q Did you speak to any of your co-workers about</p> <p>25 Mr. King's sessions?</p>	<p>Page 35</p> <p>1 A No.</p> <p>2 Q Are correctional facilities assigned a mental</p> <p>3 health level?</p> <p>4 A Yes.</p> <p>5 Q What mental health level was the correctional</p> <p>6 facility where Mr. King was an inmate?</p> <p>7 A Level 1.</p> <p>8 Q Was he at this facility at the beginning of his</p> <p>9 sentence?</p> <p>10 A I don't know.</p> <p>11 Q Was he ever at a mental healthcare unit?</p> <p>12 A Yes.</p> <p>13 Q When?</p> <p>14 A 2016 following his previous suicide attempt.</p> <p>15 Q Was he at this unit when he committed suicide?</p> <p>16 A No.</p> <p>17 Q Why?</p> <p>18 A He was not in the crisis unit.</p> <p>19 There was --</p> <p>20 Q Where was he when he committed suicide?</p> <p>21 A My understanding is, he was in the bathroom of</p> <p>22 his dorm.</p> <p>23 Q Okay. Back in 2016 when he was in mental</p> <p>24 healthcare unit, when was he transferred outside of that</p> <p>25 unit?</p>

<p>Page 36</p> <p>1 A I don't recall.</p> <p>2 Q Do you know why he was transferred out of that</p> <p>3 unit?</p> <p>4 A He would have been deemed appropriate to return</p> <p>5 to general population.</p> <p>6 Q Who deems it appropriate?</p> <p>7 A The clinical team that runs the crisis unit.</p> <p>8 Q Do you know who was this team at that time in</p> <p>9 2016?</p> <p>10 A Dr. Farago and --</p> <p>11 Q Can you please spell that last name for me?</p> <p>12 A F-a-r-a-g-o, first name Lawrence, and the crisis</p> <p>13 coordinator was at that time Lisa Williams-Burns.</p> <p>14 Q Was he screened again to know where he's supposed</p> <p>15 to be to receive adequate supervision and treatment?</p> <p>16 MS. COWAN: Objection. Go ahead.</p> <p>17 A Can you rephrase that?</p> <p>18 BY MS. KALKACH:</p> <p>19 Q Yes.</p> <p>20 When he left the mental healthcare unit in 2016,</p> <p>21 was he screened again to know what kind of treatment he</p> <p>22 needed to receive at the new facility?</p> <p>23 A It wasn't a new facility. It was here.</p> <p>24 He was just released from the crisis unit back to</p> <p>25 general population.</p>	<p>Page 38</p> <p>1 There's many policies.</p> <p>2 BY MS. KALKACH:</p> <p>3 Q Okay. Have you read them?</p> <p>4 A Yes.</p> <p>5 Q How long ago?</p> <p>6 A Not since 2018.</p> <p>7 In regards to how often a person seen, in regards</p> <p>8 to that they're seen by -- if they went to the crisis unit,</p> <p>9 they had to be seen within seven days.</p> <p>10 Q So were you trained by the correctional facility</p> <p>11 how to deal with inmates with mental illness?</p> <p>12 A Yes.</p> <p>13 Q Were you trained by the correctional facility on</p> <p>14 the process to report when an inmate speaks to you about</p> <p>15 suicide?</p> <p>16 A Yes.</p> <p>17 Q How were you trained?</p> <p>18 A I was trained by following -- reading the</p> <p>19 policies and following them.</p> <p>20 Q Who gets this training?</p> <p>21 A Everybody that works here should.</p> <p>22 Q Is it mandatory training?</p> <p>23 A Yes.</p> <p>24 Q Is this part of the training that you take once a</p> <p>25 year?</p>
<p>Page 37</p> <p>1 Q When he was released back to general population,</p> <p>2 was he screened again to know what kind of care he needed?</p> <p>3 A He would have been screened by the crisis</p> <p>4 coordinator -- would have deemed him appropriate to leave</p> <p>5 and returned back to his dorm, which then policy is to be</p> <p>6 seen within seven days of his release, which he would have</p> <p>7 been seen by me seven days from that release.</p> <p>8 Q Did he speak to you about his transfer to general</p> <p>9 population?</p> <p>10 A Yes.</p> <p>11 Q What were the sum and substance of that</p> <p>12 conversation?</p> <p>13 A I don't remember.</p> <p>14 Q Was he worried about going back to general</p> <p>15 population?</p> <p>16 A Not to my knowledge.</p> <p>17 Q Did his wife speak to you about his transfer to</p> <p>18 general population?</p> <p>19 A No.</p> <p>20 Q Are you aware of any policy regarding inmates</p> <p>21 with mental illness?</p> <p>22 A Yes.</p> <p>23 Q What are they?</p> <p>24 MS. COWAN: Objection. Go ahead.</p> <p>25 A Any specific policy?</p>	<p>Page 39</p> <p>1 A I think you only just --</p> <p>2 I mean, the policies are always available to</p> <p>3 refer back to.</p> <p>4 Q But you don't get an actual training where you</p> <p>5 have to go see someone explain --</p> <p>6 How is this training?</p> <p>7 A No.</p> <p>8 Usually when you first come, when you first</p> <p>9 start, and then as necessary.</p> <p>10 Q "As necessary" meaning?</p> <p>11 A Sometimes they get updated. If it gets updated,</p> <p>12 then you have to review them.</p> <p>13 Q Do you get an e-mail with the updates, or you</p> <p>14 have to do it by yourself, or how does it work?</p> <p>15 A Get an e-mail with the updates.</p> <p>16 Q Does anybody follow up to see if you read the</p> <p>17 policy?</p> <p>18 A No.</p> <p>19 Q So the update is not really mandatory?</p> <p>20 MS. COWAN: Hang on one second. Are people</p> <p>21 trying to come in your office? Is that what's going</p> <p>22 on?</p> <p>23 THE WITNESS: Yes, of course. If I wasn't doing</p> <p>24 anything, nobody would want to talk to me.</p> <p>25 MS. COWAN: All right. Sorry.</p>

<p>Page 40</p> <p>1 A Can you repeat that again?</p> <p>2 BY MS. KALKACH:</p> <p>3 Q I asked if the training then is really mandatory.</p> <p>4 A Yes.</p> <p>5 Q Yet nobody follows up?</p> <p>6 A Right.</p> <p>7 Q Do people with mental illnesses receive any</p> <p>8 special care within the correctional?</p> <p>9 MS. COWAN: Objection. Go ahead.</p> <p>10 A In regards to?</p> <p>11 Can you explain better?</p> <p>12 I'm sorry.</p> <p>13 BY MS. KALKACH:</p> <p>14 Q What kind of special treatment in regards to</p> <p>15 anything.</p> <p>16 So, yes or no, if they receive any special care</p> <p>17 when they have a mental illness.</p> <p>18 A Not --</p> <p>19 No.</p> <p>20 I'm sorry.</p> <p>21 MS. COWAN: Objection.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q Okay. Is there a specific area within the</p> <p>24 correctional facility where people with mental illness</p> <p>25 should be?</p>	<p>Page 42</p> <p>1 A Can you rephrase that?</p> <p>2 BY MS. KALKACH:</p> <p>3 Q Yes.</p> <p>4 After Mr. King attempted to commit suicide, was</p> <p>5 there any change to medication that he received?</p> <p>6 A I don't recall.</p> <p>7 Q Was there any change on the way that he was being</p> <p>8 treated by the staff?</p> <p>9 A No.</p> <p>10 Q Was there any change on the place he was staying?</p> <p>11 A No.</p> <p>12 MS. COWAN: Objection.</p> <p>13 BY MS. KALKACH:</p> <p>14 Q Was there any change on the supervision that he</p> <p>15 was getting?</p> <p>16 MS. COWAN: Objection, because when we're talking</p> <p>17 about someone in the correction facility, we're talking</p> <p>18 about corrections staff and mental health staff, so</p> <p>19 there's a lot that goes into that.</p> <p>20 So if you're talking about supervision, I think</p> <p>21 maybe a little more specific would help.</p> <p>22 MS. KALKACH: I'm just waiting to see if she</p> <p>23 answers or --</p> <p>24 A Can you repeat that?</p> <p>25 MS. KALKACH: Yes. Gina, could you please repeat</p>
<p>Page 41</p> <p>1 A No, not exactly.</p> <p>2 There is an area for individuals that have been</p> <p>3 diagnosed with a severe mental illness and that are having</p> <p>4 difficulty functioning because of their mental illness.</p> <p>5 Q Was Mr. King there?</p> <p>6 A No.</p> <p>7 Q Do people that have tried to commit suicide</p> <p>8 inside the correctional get any special attention or care?</p> <p>9 MS. COWAN: Objection.</p> <p>10 A No.</p> <p>11 BY MS. KALKACH:</p> <p>12 Q Your answer was "no," correct?</p> <p>13 A Yes.</p> <p>14 Q Do you know why Mr. King was allowed to have his</p> <p>15 shoelaces after he had attempted suicide with them in the</p> <p>16 past?</p> <p>17 A I don't know why.</p> <p>18 Q Do you know who made that decision?</p> <p>19 A Corrections.</p> <p>20 Q Do you know which person?</p> <p>21 A No.</p> <p>22 Q After Mr. King attempted to commit suicide, was</p> <p>23 there any change in the treatment at the correctional?</p> <p>24 MS. COWAN: Objection. Can you answer that? I</p> <p>25 don't really understand myself but...</p>	<p>Page 43</p> <p>1 my question?</p> <p>2 (Last question was read back.)</p> <p>3 A Supervision from whom?</p> <p>4 BY MS. KALKACH:</p> <p>5 Q From the staff after he committed suicide.</p> <p>6 MS. COWAN: Same objection. Answer if you can.</p> <p>7 A After he attempted suicide, he was brought to the</p> <p>8 crisis care unit.</p> <p>9 BY MS. KALKACH:</p> <p>10 Q Okay.</p> <p>11 A So it's a higher level of care.</p> <p>12 Q Was he screened in order to know that he needed</p> <p>13 to be there?</p> <p>14 A Usually after a suicide attempt, they're placed</p> <p>15 in --</p> <p>16 They are taken --</p> <p>17 That is kind of their screening. They take them</p> <p>18 to the crisis unit for eminent risk.</p> <p>19 Q Were there any potential indicators that Mr. King</p> <p>20 was going to attempt suicide for a second time?</p> <p>21 MS. COWAN: Objection. Go ahead.</p> <p>22 A No.</p> <p>23 BY MS. KALKACH:</p> <p>24 Q What are potential suicide indicators?</p> <p>25 A Isolation, separation, usually if somebody is</p>

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<p>1 expressing thoughts of self-harm or suicidal ideation, a</p> <p>2 recent loss.</p> <p>3 There's many different things that could be</p> <p>4 indicated.</p> <p>5 Q Did Mr. King show any of the ones that you told</p> <p>6 me before?</p> <p>7 A In our last session, no.</p> <p>8 Q Not in the last session, but what about in the</p> <p>9 six months following -- I mean leading up to the suicide?</p> <p>10 A My understanding is that his mom passed way</p> <p>11 within that, and I updated his suicide risk assessment</p> <p>12 accordingly, but he adamantly denied thoughts of self-harm.</p> <p>13 MS. KALKACH: I move to strike the portions that</p> <p>14 are nonresponsive.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q Was there any support offered to you by the</p> <p>17 correctional facility after the suicide?</p> <p>18 A Not that I remember.</p> <p>19 Q Did Mr. King show increased level of agitation?</p> <p>20 A No.</p> <p>21 Q Did Mr. King show an increased level of anxiety?</p> <p>22 A No.</p> <p>23 Q When you spoke about his mom passing, what were</p> <p>24 his feelings towards that?</p> <p>25 A That his mother was in her 90s and that she was</p>	<p>1 the corrections.</p> <p>2 Q And what are this person's duties?</p> <p>3 A I don't know.</p> <p>4 MS. COWAN: So the watch commander, not the</p> <p>5 suicide watch commander; right?</p> <p>6 MS. KALKACH: No. The suicide watch commander.</p> <p>7 MS. COWAN: Okay. Are you familiar with the</p> <p>8 suicide watch commander?</p> <p>9 THE WITNESS: No.</p> <p>10 BY MS. KALKACH:</p> <p>11 Q Do you know what suicide watch is?</p> <p>12 A Yes.</p> <p>13 Q When is an inmate placed on a suicide watch?</p> <p>14 A When someone engages in self-harm or is</p> <p>15 expressing thoughts of -- or if there are threats of</p> <p>16 self-harm or actually engage in acts of self-harm or a</p> <p>17 suicide attempt.</p> <p>18 Q And what does suicide watch entail?</p> <p>19 A Usually they have somebody --</p> <p>20 They wind up in the crisis unit in a cell -- in</p> <p>21 an observation cell with all their amenities stripped or</p> <p>22 they are on a one-to-one watch with a corrections officer.</p> <p>23 Q Are there standard items that the inmate could</p> <p>24 have or could not have?</p> <p>25 A Depending on the person's situation.</p>
Page 45	Page 47
<p>1 chronically ill, and he got to speak to her before she</p> <p>2 passed.</p> <p>3 Q What were his feelings regarding the drugs that</p> <p>4 he was taking?</p> <p>5 MS. COWAN: Objection. You're talking about the</p> <p>6 illegal drugs or the prescription drugs or --</p> <p>7 MS. KALKACH: Both.</p> <p>8 MS. COWAN: Maybe during like a certain time</p> <p>9 period?</p> <p>10 BY MS. KALKACH:</p> <p>11 Q Six months leading up to the suicide attempt.</p> <p>12 A He was --</p> <p>13 I don't recall.</p> <p>14 Q Did his anxiety level increase because of his</p> <p>15 parole board hearing?</p> <p>16 A Not that I was aware of.</p> <p>17 Q Did Mr. King show increased level of depression?</p> <p>18 A Not that I was aware of.</p> <p>19 Q Do you know what a suicide watch commander is?</p> <p>20 A Yes.</p> <p>21 Q Who had that position?</p> <p>22 A That's --</p> <p>23 The watch commander?</p> <p>24 Q Yes.</p> <p>25 A It's one of the sergeants or the deputies up at</p>	<p>1 Q Was Mr. King ever placed on suicide watch?</p> <p>2 A I don't recall. I don't know.</p> <p>3 Q Do you know what a parole board hearing is?</p> <p>4 A Yes.</p> <p>5 Q Did you have any role in placing an inmate on</p> <p>6 suicide watch?</p> <p>7 A Yes.</p> <p>8 Q What was your role?</p> <p>9 A If somebody --</p> <p>10 If somebody told me that they were having</p> <p>11 thoughts of self-harm or threats of self-harm, they would be</p> <p>12 placed in the crisis unit.</p> <p>13 Q Yes, but your involvement, what would you do?</p> <p>14 A I would make the call to place him in the crisis</p> <p>15 unit. I would have assessed the situation, and then if it</p> <p>16 warranted a higher level of care, then they would be placed</p> <p>17 in a crisis unit.</p> <p>18 Q Okay. Do you have to report it to someone?</p> <p>19 How does it get --</p> <p>20 A Yes.</p> <p>21 Q What was the process?</p> <p>22 A I would let the officer at our front desk know,</p> <p>23 who would let nursing know, and also the watch commander and</p> <p>24 movement.</p> <p>25 Q Did you ever make this call for Mr. King?</p>

<p>Page 48</p> <p>1 A No.</p> <p>2 Q Do you get notified when an inmate is going to</p> <p>3 get his or her parole board hearing?</p> <p>4 A Usually they give us a parole evaluation to</p> <p>5 complete, so about 30 days to a couple months before.</p> <p>6 Q What does this parole evaluation contain?</p> <p>7 A Their mental health history, are they taking</p> <p>8 medication, are they compliant with medication, when they</p> <p>9 came to the facility, and when they're scheduled to be</p> <p>10 released.</p> <p>11 Q Are there common emotional changes on inmates</p> <p>12 when the hearing is approaching?</p> <p>13 MS. COWAN: Objection.</p> <p>14 A I don't understand.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q Is there something special that you need to watch</p> <p>17 when there's a parole hearing coming?</p> <p>18 A No.</p> <p>19 Q And why do you get notified 30 days before it's</p> <p>20 coming?</p> <p>21 A To complete the evaluation. They give us the</p> <p>22 evaluation. It can be anywhere like a couple months to like</p> <p>23 a month before.</p> <p>24 Q And is there any -- any different consequences</p> <p>25 that --</p>	<p>Page 50</p> <p>1 A CNYPC, Central New York Psychiatric Center.</p> <p>2 Q Who?</p> <p>3 A Education & Training.</p> <p>4 Q Who pays for it?</p> <p>5 A I don't know.</p> <p>6 Q How long does the training last?</p> <p>7 A It's usually probably about an hour.</p> <p>8 Q So one hour every year to talk about suicide</p> <p>9 prevention, approximately?</p> <p>10 A Yes.</p> <p>11 Q Did you do official evaluations for suicide risk?</p> <p>12 A Can you repeat that, please?</p> <p>13 Q Yes.</p> <p>14 Did you do any official evaluations for suicide</p> <p>15 risk?</p> <p>16 A Yes.</p> <p>17 Q How often would you do those evaluations?</p> <p>18 A Within two weeks of somebody being --</p> <p>19 transferring into the facility. And policy was, once every</p> <p>20 two years or as indicated, like if new risks came up, if</p> <p>21 there were new risks or protective factors.</p> <p>22 Q Okay. And who would indicate it?</p> <p>23 A The patient.</p> <p>24 Q What would you consider a suicide risk factor?</p> <p>25 A Suicide history, family history, substance abuse,</p>
<p>Page 49</p> <p>1 Okay, scratch that.</p> <p>2 Were you aware that Mr. King had a parole hearing</p> <p>3 in January 2019?</p> <p>4 A No.</p> <p>5 Q Could there be different outcomes after you</p> <p>6 complete a parole evaluation --</p> <p>7 MS. COWAN: Objection.</p> <p>8 BY MS. KALKACH:</p> <p>9 Q -- depending on -- depending on what you find?</p> <p>10 A No.</p> <p>11 I don't know.</p> <p>12 Q Who do you give the parole evaluation to?</p> <p>13 A We complete it and provide it to community</p> <p>14 supervision.</p> <p>15 Q Did you speak to Mr. King about his parole</p> <p>16 hearing that was coming in January of 2019?</p> <p>17 A No.</p> <p>18 Q Have you ever received training or education on</p> <p>19 suicide prevention?</p> <p>20 A Yes.</p> <p>21 Q When did you receive it?</p> <p>22 A We receive it --</p> <p>23 It's one of the mandatory trainings we get</p> <p>24 yearly.</p> <p>25 Q Who provides it?</p>	<p>Page 51</p> <p>1 mental health hospital -- history of mental health</p> <p>2 hospitalizations, adverse outcome to a parole board, or if</p> <p>3 somebody got tickets.</p> <p>4 Q Within the last year, had Mr. King presented with</p> <p>5 any of those?</p> <p>6 A Yes.</p> <p>7 Q How would you perform the evaluation?</p> <p>8 A Yes.</p> <p>9 Q I mean how.</p> <p>10 A How?</p> <p>11 Based on a discussion with Mr. King.</p> <p>12 Q Okay.</p> <p>13 A And also if I receive information about -- like</p> <p>14 if there was a ticket or if he told me about a ticket, then</p> <p>15 I'd update it to make sure it reflects what was going on in</p> <p>16 his life at that time.</p> <p>17 Q How much time did you take to perform the suicide</p> <p>18 risk evaluation?</p> <p>19 A Usually during a session.</p> <p>20 It's done --</p> <p>21 It's done in every session with every patient we</p> <p>22 assess them for risk.</p> <p>23 Q So there are official ones that you do within two</p> <p>24 weeks of transferring, et cetera, but you also have the ones</p> <p>25 that you do every session?</p>

<p>1 A Yeah. Basically we review that same one and</p> <p>2 check for new risk or protective factors and update it</p> <p>3 accordingly.</p> <p>4 Q How long do the sessions normally take?</p> <p>5 A Between 30 and 45 minutes.</p> <p>6 Q And when you do the official evaluation, do you</p> <p>7 take -- is it a different session, or is it also within --</p> <p>8 A It's usually within the first session. It's</p> <p>9 usually --</p> <p>10 We do the core documentation. Usually the first</p> <p>11 session is a little longer than the rest of them.</p> <p>12 Q How long is it approximately?</p> <p>13 A Probably between 45 minutes to an hour.</p> <p>14 Q How did you learn to take the evaluations?</p> <p>15 A I was trained in my training when I started here.</p> <p>16 Q Who gave you the training?</p> <p>17 A It was the person that trained me from when I</p> <p>18 started working here.</p> <p>19 Q What was the name of the department that gives</p> <p>20 the training?</p> <p>21 A It's not a department. It's usually a fellow</p> <p>22 therapist that was training me.</p> <p>23 Q The one that you were shadowing?</p> <p>24 A Yes.</p> <p>25 Q Do you remember his name or her name?</p>	<p>Page 52</p> <p>1 Q How did you learn about the event?</p> <p>2 A My co-worker informed me.</p> <p>3 Q What's the name of your co-worker?</p> <p>4 A It was Amanda Knoeller.</p> <p>5 Q Can you please spell that for me?</p> <p>6 A K-n-o-e-l-l-e-r. She was the SHU coordinator.</p> <p>7 Q When did you receive notice?</p> <p>8 A Official notice?</p> <p>9 Q Yes.</p> <p>10 A Later on that afternoon from the acting unit</p> <p>11 chief.</p> <p>12 Q Was it in person, or did you receive an e-mail,</p> <p>13 or how did they give you official notice?</p> <p>14 A They send out an e-mail to make the facility</p> <p>15 aware that there's a passing.</p> <p>16 Q Where were you when you received notice?</p> <p>17 A I was at my desk.</p> <p>18 Q And where were you when you were informally told</p> <p>19 about the event?</p> <p>20 A I was at the front door before I walked in the</p> <p>21 building.</p> <p>22 Q Did you go to the scene?</p> <p>23 A No.</p> <p>24 Q Did anyone explain to you how the suicide</p> <p>25 occurred?</p> <p>Page 54</p>
<p>1 A Her name was Amy Sowich.</p> <p>2 Q Can you spell last name for me?</p> <p>3 A S-o-w-i-c-h.</p> <p>4 Q How often would you have the training?</p> <p>5 A I was trained for probably the first couple weeks</p> <p>6 that I was here in 2013.</p> <p>7 Q How long was the training session?</p> <p>8 A Oh, I was trained for the entire day.</p> <p>9 Q So the entire day for the first couple of weeks?</p> <p>10 A Weeks, yes.</p> <p>11 Q When you say "the first couple of weeks," you</p> <p>12 mean two weeks, three weeks, four weeks or something else?</p> <p>13 A Probably about three weeks -- three, four weeks.</p> <p>14 Q Are you aware of any other suicides that happened</p> <p>15 in the prison during 2013 through 2018?</p> <p>16 A Not that I can recall.</p> <p>17 Q Do you know if the correctional facility kept a</p> <p>18 suicide watch log?</p> <p>19 A I don't know.</p> <p>20 Q Where were you on November 16, 2018?</p> <p>21 This is the date that Mr. Joseph King took his</p> <p>22 life.</p> <p>23 A I was here. I came to work. By the time I --</p> <p>24 It had already happened by the time I got in to</p> <p>25 work.</p> <p>Page 53</p>	<p>1 A Yes.</p> <p>2 Q Who explained it to you?</p> <p>3 A Hal Meyers, the unit chief.</p> <p>4 Q Are you aware of what Mr. King used to kill</p> <p>5 himself?</p> <p>6 A No.</p> <p>7 Q How did the suicide occur?</p> <p>8 A My understanding is that he put his shoes in one</p> <p>9 bathroom stall and that he hung himself in another one to</p> <p>10 make it look like he was in a different stall and that he</p> <p>11 hung up.</p> <p>12 Q Do you know what he used to hang himself?</p> <p>13 A No.</p> <p>14 Q Are you aware of any investigation from the</p> <p>15 correctional facility after his suicide?</p> <p>16 A No.</p> <p>17 Q Do you know the exact location of the suicide?</p> <p>18 A No.</p> <p>19 Q Do you know who discovered the attempt?</p> <p>20 Was it staff, inmate, or someone else?</p> <p>21 A I don't know.</p> <p>22 Q Do you know if he was sent to the hospital?</p> <p>23 A I don't know.</p> <p>24 Q Do you know if the family was notified?</p> <p>25 A I don't know.</p> <p>Page 55</p>

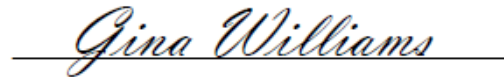
<p>1 Q Do you know who was Mr. King's emergency contact?</p> <p>2 A It was his wife.</p> <p>3 Q Do you know his wife's name?</p> <p>4 A Amy King.</p> <p>5 Q Do you know if she was notified?</p> <p>6 A I don't know.</p> <p>7 Q Do you know Mr. King's reasons for his actions?</p> <p>8 A I'm sorry.</p> <p>9 Can you repeat that?</p> <p>10 Q Yes.</p> <p>11 Do you know Mr. King's reasons for his actions?</p> <p>12 A No.</p> <p>13 Q Was there anything different that you could have</p> <p>14 done to prevent his suicide?</p> <p>15 MS. COWAN: Objection.</p> <p>16 A No.</p> <p>17 MS. KALKACH: Now I'm going to ask for a couple</p> <p>18 of minutes to review my notes and see if I have any</p> <p>19 more questions.</p> <p>20 MS. COWAN: Okay.</p> <p>21 MS. KALKACH: Thank you.</p> <p>22 (Recess was taken.)</p> <p>23 MS. KALKACH: I only have a couple of follow-up</p> <p>24 questions.</p> <p>25</p>	<p>Page 56</p> <p>1 BY MS. KALKACH:</p> <p>2 Q Okay. You also testified that you routinely see</p> <p>3 inmates -- saw inmates once per month; is that correct?</p> <p>4 A Yes.</p> <p>5 Q In your opinion, is this policy sufficient to</p> <p>6 provide care for an inmate with a health illness?</p> <p>7 MS. COWAN: Objection. Go ahead.</p> <p>8 A Yes, as long as the situation is warranted.</p> <p>9 If there's an emergency, then they may be seen</p> <p>10 more than one time a month.</p> <p>11 BY MS. KALKACH:</p> <p>12 Q You've got to use a lot of discretion in your</p> <p>13 role; correct?</p> <p>14 A Yes.</p> <p>15 MS. KALKACH: I have no further questions.</p> <p>16 MS. COWAN: All right. I don't have any</p> <p>17 questions for you, so we can go off the record now. I</p> <p>18 want them to read and sign. I totally forgot to</p> <p>19 mention that during Mr. Meyers' deposition. Sorry</p> <p>20 about that. If you could just add that to the</p> <p>21 transcript, that would be great.</p> <p>22 (Whereupon, the deposition was concluded at</p> <p>23 2:31 p.m.)</p> <p>24</p> <p>25</p>
<p>Page 57</p> <p>1 BY MS. KALKACH:</p> <p>2 Q Ms. Palladino?</p> <p>3 A Yes.</p> <p>4 Q After an inmate expresses that they need to see a</p> <p>5 doctor, you testified that it could take a week or two to be</p> <p>6 seen; is that correct?</p> <p>7 A If an inmate is requesting to see a doctor and</p> <p>8 it's not an emergency situation, it could take --</p> <p>9 It depends on the person's situation. It depends</p> <p>10 on the circumstance.</p> <p>11 Q What could be understood as an emergency</p> <p>12 situation?</p> <p>13 A If somebody is expressing thoughts of self-harm</p> <p>14 or they're having psychotic symptoms, they may be able to --</p> <p>15 they would be brought to the crisis unit.</p> <p>16 Otherwise, prescribers usually don't see their</p> <p>17 patients --</p> <p>18 They see them once every three months.</p> <p>19 Q And in your opinion, does that meet what could be</p> <p>20 a serious need to see a mental health provider?</p> <p>21 MS. COWAN: Objection. Go ahead.</p> <p>22 A If a person's experiencing thoughts of self-harm</p> <p>23 or if they're having a -- if they're having psychotic</p> <p>24 symptoms, yes.</p> <p>25</p>	<p>Page 58</p>

1 CERTIFICATE

2 I, Gina Williams, Registered Professional Court
3 Reporter, do certify that the above deposition was reported
4 by me and that the foregoing transcript is a true and
5 accurate record to the best of my knowledge, skills, and
6 ability.

7 I further certify that I am not an employee of
8 counsel or any of the parties, nor a relative or employee of
9 any attorney or counsel connected with the action, nor
10 financially interested in the action.

11 Subscribed and sworn to before me when taken this
12 23rd day of May, 2022.

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15 GINA WILLIAMS, RPR, CRR
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ACKNOWLEDGMENT OF DEPONENT

I, JAMI PALLADINO, do hereby certify that I have read the foregoing pages and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.

JAMI PALLADINO

Date

Subscribed and sworn to before me this

___ day of _____, 2022.

My commission expires: _____

Notary Public

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- - - - -

2

ERRATA

3

- - - - -

4

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CHANGE/REASON

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Sheet (1)	Suboxone (3)	today (7)	wanted (2)
shoelaces (3)	Subscribed (2)	today's (2)	WARD (1)
shoes (1)	substance (9)	told (4)	warranted (2)
show (6)	suffering (2)	topics (1)	watch (16)
showing (2)	sufficient (1)	totally (1)	way (5)
shred (2)	suicidal (2)	trained (8)	week (3)
shredded (1)	suicide (62)	training (21)	weeks (16)
SHU (1)	suicides (1)	trainings (3)	went (3)
shut (1)	Suite (1)	transcript (2)	we're (3)
sign (1)	sum (7)	transcription (1)	wife (8)
signed (1)	supervision (5)	transfer (2)	wife's (1)
simply (1)	support (1)	transferred (2)	Williams (3)
situation (6)	supportive (1)	transferring (2)	
six (2)	supposed (1)	traumatized (1)	
	sure (5)		

Williams-Burns (1)
wind (1)
withdrawal (1)
WITNESS (5)
words (1)
work (8)
workday (3)
worked (3)
worker (1)
working (4)
Workplace (2)
works (2)
worksheets (2)
worried (6)
write (3)
writing (2)
written (3)
wrote (4)

< Y >

YAMILE (2)
Yeah (2)
year (7)
yearly (2)
Years (5)
YORK (8)

< Z >

Zoom (2)